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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

August 18, 2020

MEMORANDUM

SUBJECT: Evaluation of Inert Ingredient in SURFACEWISE 2 (COMBO-A2015)
Section 18 No.: 20TX04

FROM: Kerry Leifer, Chief
Chemistry, Inerts, and Toxicology Assessment Branch
Registration Division (7505P)

TO: Andrea Conrath
Emergency Response Team
Minor Use and Emergency Response Branch
Registration Division (7505P)

An Emergency Exemption Request was submitted to the Agency for under Section 18 of FIFRA for a Public Health Exemption for the use of an unregistered pesticide product (SurfaceWise2®) for control of coronavirus and to reduce the spread of COVID-19 on hard, non-porous surfaces in aircraft and facilities owned or controlled by American Airlines in Texas. As part of the evaluation of the Section 18 request, it was determined that the product formulation contains an inert ingredient, [REDACTED] that is not listed as an approved inert in

The Chemistry, Inerts, and Toxicology Assessment Branch (CITAB) has been asked to evaluate the risks associated with the use of [REDACTED] as an inert ingredient in the subject product, under the conditions associated with the Section 18 request.

[REDACTED] Exposures to applicators of a pesticide product containing [REDACTED] may occur via the inhalation or dermal routes. It is also possible that the general population are exposed by the dermal and inhalation routes during application or following application of a pesticide product containing [REDACTED]. No oral exposure is anticipated for either workers or the general population. [REDACTED]

Inert ingredient information may be entitled to confidential treatment

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The proposed product use information provided with the Emergency Exemption request (draft label dated 7/26) indicates that the product will be used to treat up to 80 million square feet of surface area (20 million square feet treated up to 4 times) inside American Airlines Aircraft and facilities in the state of Texas. 6250 gallons of SurfaceWise2, applied at a rate of 3200 square feet per gallon, will cover 20 million square feet per application.

Maximum Total Usage: Four – 6250 gallon applications = 25,000 total gallons of SurfaceWise2, approx. 1575 pounds ai. (0.063 pounds of ai per gallon of SurfaceWise2).

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Based on the Confidential Statement of Formula provided with the Emergency Exemption request and the draft product label, [REDACTED]

Typically, the Agency has no concerns for Margins of Exposure >100 for both applicators and for post-application scenarios. In the case of applicators, the draft product label includes the use of N95 or equivalent masks and gloves, so exposure to [REDACTED] by applicators of SurfaceWise 2 would be negligible and not of concern. In the case of post-application exposures, using the conservative assumption that post-application exposures would be to 3200 square feet of treated surface area, the MOE for dermal exposure would be [REDACTED] and the MOE for inhalation exposure would be [REDACTED]

These exposure estimates are highly conservative in nature, so the actual MOEs for dermal and inhalation exposure are likely to be significantly greater than [REDACTED] respectfully, and are without concern.

Therefore, based upon the available toxicity data for [REDACTED] and a conservative estimate of exposure to [REDACTED] to applicators and via post-application exposure resulting from the use of SurfaceWise 2 based on the draft label, the presence of [REDACTED] in the product would not be of risk concern.